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Alexandria, VA 22314

28 March 2002

Chief  
Standardization Branch  
Livestock and Seed Program  
AMS/USDA  
Room 2603-S, Stop 0254  
1400 Independence Avenue, SW  
Washington, DC 20250-0254

Re: Docket Number LS-02-02 concerning Meat Marketing Labeling Standards

Dear Sir/Madam:

I am writing to express my concern with the recently proposed meat marketing labeling claims and standards.

After careful review of the proposed standards, I am concerned that these claims could undermine the integrity of the labels the proposed claims and standards seek to define. These claims and standards could also mislead consumers and have a devastating affect on small and mid-sized farmers who are pioneers of these marketing claims. I am also concerned that USDA did not take the time to get input from family farmer, consumer, humane, and environmental groups in drafting the proposed standards, but instead conferred primarily with large-scale, industrial agricultural interests.

My concerns center on the following:

- (1) The proposed label claim for "no subtherapeutic antibiotics added or not fed antibiotics." The claim stating "no subtherapeutic antibiotics added" has serious definitional problems. Your own department does not define the term "subtherapeutic" and other institutions have varied and conflicting definitions.
- (2) The proposed labeling claim for "no detectable antibiotic residue", which could mislead consumers to believe that they are purchasing meat from producers whose practices do not contribute to antibiotic resistance, even though producers using the claims are using antibiotics.
- (3) The label claim for "grass-fed" appears to create a loophole for producers who want to market their livestock as grass-fed when in fact the animal is receiving grain supplements for a large percentage of their production cycle. Also, the grass-fed claim could confuse consumers who buy grass-fed meat for specific, nutritional benefits only achieved when livestock are strictly grass-fed in the final months before slaughter.

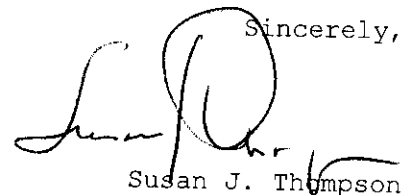
(4) The claim for "free-range, free-roaming and pasture-raised" meat also has definitional problems. Your Notice defines these label claims as "Livestock that have had continuous and unconfined access to pasture throughout their lifecycle, including: Cattle and Sheep- which shall never be confined to a feedlot; and Swine which shall have continuous "access" to pasture for at least 80% of their production cycle. The proposed labeling claims do not provide a definition for "feedlot" as it relates to cattle and sheep and they do not define "access" in the case of swine. Furthermore, it is unclear whether the whole-herd, including the breeder stock for the livestock being produced, are raised continuously under these minimum standards.

I urge the Agricultural Marketing Service of USDA to:

Withdraw the proposed meat marketing claims and standards and start over again beginning with a more extensive and inclusive process that seeks substantial input from family farm, consumer, humane, and environmental organizations before issuing a final proposal.

I care deeply about being able to purchase grass-fed, free-range, and antibiotic free meat and want proposed USDA claims to meet accurately inform me of how my meat was raised and (in future regulations) how it was slaughtered.

Sincerely,



Susan J. Thompson